

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D-1 Keondrick Rayford

D-2 Kendrick Rayford

Case: 2:22-mj-30390

Assigned To : Unassigned

Assign. Date : 9/14/2022

Case No.

Description: RE: KEONDRICK  
RAYFORD, KENDRICK RAYFORD  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 11 through September 13, 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section*

18 U.S.C. § 922(u)

18 U.S.C. § 922(j)

*Offense Description*

Theft of Firearms from a Federal Firearms Dealer Licensee

Knowingly Possessing Stolen Firearms

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: September 14, 2022City and state: Detroit, Michigan*Complainant's signature*Mallorie Campbell, Special Agent, ATF*Printed name and title**Judge's signature*Hon. David R. Grand, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Mallorie Campbell, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives since December of 2021. I am currently assigned to the Detroit Field Division, Group IV. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Before working for the ATF, I was a Sheriff's Deputy with the Jefferson County Sheriff's Office, Louisville, KY, for approximately eight years. Prior to becoming a Special Agent with ATF, I was assigned to the Federal Bureau of Investigation, Louisville, White Collar Crimes Task Force as a Task Force Officer for approximately four years.

2. The facts contained in this affidavit come from my personal observations, my training and experience, my review of documents and statements, information obtained from other law enforcement officers, and individuals with knowledge of this matter. This affidavit does not provide every detail I know regarding this investigation.

3. Based on ATF's investigation in this case, there is probable cause showing that (1) KEONDRICK RAYFORD ("KEONDRICK"), B/M, DOB xx-xx-xx01 violated Title 18 U.S.C § 922(u) (Theft of Firearms from a Federal Firearms

Licensee) and Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms), and (2) and KENDRICK RAYFORD (“KENDRICK”), B/M/, DOB xx/xx/xx04, violated Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms), as discussed below.

### **Probable Cause**

1. On September 11, 2022, at approximately 4:31 am, a Kia SUV, reported stolen that same day, crashed through the front of the Freedom Holster Gun Shop, a Federal Firearms Licensee (FFL), located at 1310 S. Wayne Road, Westland, MI, 48186. I reviewed the video from surveillance cameras from the FFL and approximately seven unknown individuals rushed into the FFL and were observed grabbing multiple firearms seconds before exiting the FFL (see exhibits 1 and 2). The FFL estimate approximately fifty firearms were stolen. The unidentified individuals exited through the front and ran eastbound towards Hazelwood Street. It appears the unidentified individuals are wearing facemasks, gloves, long sleeved shirts, and some were in possession of a bag. The individuals were inside the FFL for less than one minute.



**Exhibits 1 and 2: Images taken from theft of Freedom Holster Gun Shop**

2. Thirty minutes later, at approximately 5:00 am, approximately two individuals wearing dark clothing are seen breaking into CVS Pharmacy store, located at 7291 N. Middlebelt Road, Westland, MI, 48185, and exited with bottles of liquor. This CVS is approximately 5.7 miles from Freedom Holster Gun Shop. The robbers were in the store less than one minute. Surveillance video captured part of the theft. Officers compared the two videos, and at least one of the two individuals robbing the CVS appears to be wearing the same clothing as one of the

individuals who robbed the Freedom Holster Gun Shop. The individual appears to be wearing the same dark colored pants with white stripes on the pant leg.

3. On the same date, at approximately 5:04 am, a silver Dodge Journey, later reported stolen, crashed through the front of CC Coins Jewelry and Loan, an FFL located at 24614 W. Warren St., Dearborn Heights, MI 48127. Shortly after crashing into the store, three unknown individuals entered through the front of the FFL and after a short time the unknown individuals exited with multiple firearms. Two individuals were wearing blue hooded sweatshirts and face masks while the third individual was wearing a grey hoodie and dark pants. Officers compared the video from the CC break-in with the video from the Freedom Holster Gun Shop break-in, and one of the individuals appears to be wearing the same clothing in both robberies: a gray hoodie and dark pants (although this individual is wearing different masks in the two different robberies). The FFL estimate approximately twenty-two firearms were stolen.

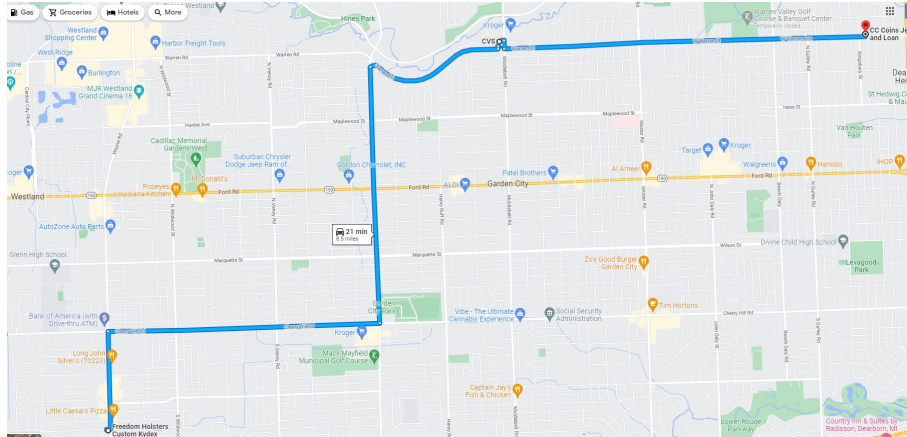
4. On September 12, 2022, at approximately 12:15 am, a blueish gray Chevrolet Equinox, later reported stolen, crashed through the front of CC Coin Jewelry and Loan. This is the same location that was robbed on September 11, 2022. Shortly after crashing into the store, two unknown black males and a third unknown male entered through the front of the FFL, grabbed multiple firearms, exited, and returned for more firearms. Approximately fifteen minutes later the

unknown individuals exited with multiple firearms. The robbery on September 12, 2022, was conducted in the same manner as the robbery on the previous day.

5. Based on my training, experience, and investigation in this case, including interviewing victims and law enforcement officers, reviewing surveillance video, and reading reports, I believe the same group of unknown individuals committed the three robberies described above.

6. First, the three FFL robberies, were committed in the same manner: individuals crashed a stolen vehicle into the front of the store and then several men stole a significant number of firearms from each location.

7. Second, all three robbery locations (covering four robberies) are in close proximity to each other and occurred near the same time very early in the morning. On September 11, the Freedom Holster Gun Shop FFL burglary occurred at approximately 4:30 am (approximately 5.7 miles from CVS); the CVS burglary occurred at around approximately 5:00 am (approximately 2.8 miles from CC Coin FFL); and the CC Coin FFL burglary occurred at approximately 5:04 am. The very next day, again early in the morning, a group of individuals robbed the same CC Coin FFL a second time. All three locations are within approximately 20 minutes of each other. See google image with all three locations below.



8. Third, one of the robbers from the CVS robbery appears to be wearing the same clothing as one of the robbers from the Freedom Holster Gun Shop robbery. And a different individual from the CC Coins FFL robbery appears to be wearing the same clothing as one of the robbers from the Freedom Holster Gun Shop robbery.

9. Finally, on September 11, 2022, approximately seven people are seen robbing the Freedom Holster Gun shop, at least two people robbed the CVS, and at least three people robbed the CC Coins FFL. The same group could have been involved in all three robberies, or the group could have split after the Freedom Holster Gun Shop robbery. And the robbery on September 12, 2022, was conducted in the same manner as the robberies conducted on September 11, at one of the same locations. But the matching clothing, similar means of committing the crimes, and time/location of the three robberies lead me to believe that all four robberies were committed by the same group of people.

10. These burglaries have been on the news, and law enforcement is currently offering a \$20,000 reward for information on the suspects.

11. On September 12, 2022, an individual approached the Westland Police and told them that he was friends with one of the robbers, knew that his friend was one of the robbers, and wanted to cooperate for reward money. ATF agents interviewed the individual (“cooperating witness”), who stated that “Kee,” a friend of his who lives in the same neighborhood, committed the robberies. Cooperating witness provided agents with Kee’s phone number, Instagram account, and Facebook account. Law enforcement identified the user of those accounts as KEONDRICK RAYFORD (“KEONDRICK”). KEONDRICK’s driver’s license picture matches the picture of the user of these accounts, and cooperating witness looked at KEONDRICK’s driver’s license photo and confirmed that KEONDRICK’s is the man he knows as “Kee.”

12. Cooperating witness said that KEONDRICK came over to his (cooperating witnesses’) house on the night of September 11 wearing the same clothes as one of the robbers from the CC Coins FFL robbery: cooperating witness saw the video of the robbery on the news and recognized the clothing. Cooperating witness provided ATF agents with the video from his Ring doorbell camera from KEONDRICK’s visit on September 11, and ATF agents confirmed that the person in that video appears to be KEONDRICK and that he is wearing the same clothing as one of the CC Coins FFL robbers.



13. While at cooperating witnesses' house on September 11, KEONDRICK had a backpack full of guns; he showed the guns to cooperating witnesses.

14. The following day, on September 12, 2022, cooperating witness and KEONDRICK exchanged text messages, which were shown to ATF Agents. KEONDRICK sent cooperating witness a news story about the FFL robberies and told cooperating witness that he (KEONDRICK) was on the news. Cooperating witness and KEONDRICK then discussed the possibility of cooperating witness buying some of the guns stolen from the FFLs from KEONDRICK. KEONDRICK sent cooperating witness a picture of a very distinct Glock handgun that he was willing to sell. The Glock had a red dot sight, appeared to be ported (holes in the barrel), and had other distinctive markings. ATF agents showed the picture of this distinctive Glock to the owner of CC Coins FFL, and the owner confirmed that the Glock appeared to be one of the guns stolen from his store on September 11.

15. Law enforcement arrested KEONDRICK and KENDRICK on September 13, 2022. Both men were taken into custody and interviewed.

16. KEONDRICK admitted to conducting both of the CC Coins FFL robberies. KEONDRICK said that during both CC Coin robberies, he ran into the store after a vehicle crashed into the front, grabbed firearms, took them outside and put them into a getaway vehicle (a small white car during the first robbery, and a black SUV the

second time), ran back into the store to get more guns, and put them in the getaway vehicles as well.

17. KENDRICK said that he did not participate in the robberies but admitted that he saw his brother KEONDRICK possessing—holding—some of the stolen guns. KENDRICK further admitted to physically holding the stolen guns himself and told agents that his DNA would be on at least one of the stolen guns. KENDRICK said that he knew that the guns were stolen. KENDRICK also admitted to personally taking pictures of two AR-style weapons that KEONDRICK stole in an attempt to help KEONDRICK get rid of the weapons. KENDRICK admitted to sending the pictures that he took of these AR-style weapons, which he knew were stolen, to one person in an attempt to get rid of them.

### **Conclusion**

18. Based on the aforementioned facts, I submit that there is probable cause showing that (1) KEONDRICK RAYFORD (“KEONDRICK”), B/M, DOB xx-xx-xx01 violated Title 18 U.S.C § 922(u) (Theft of Firearms from a Federal Firearms Licensee) and Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms), and (2) and KENDRICK RAYFORD (“KENDRICK”), B/M/, DOB xx/xx/xx04, violated Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms).

19. These violations occurred in the Eastern District of Michigan.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read 'Mallorie Campbell', written in a cursive style.

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Mallorie Campbell, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read 'David R. Grand', written in a cursive style.

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Hon. David R. Grand  
United States Magistrate Judge

Date: September 14, 2022